REMARKS

Reconsideration of the present application is respectfully requested in view of the following remarks. Prior to entry of this response, Claims 1-24 were pending in the application, of which Claims 1 and 10 are independent. In the Office Action dated February 24, 2006, Claims 1-24 were rejected under 35 U.S.C. § 103(a). Following this response, Claims 1-24 remain in this application. Applicants hereby address the Examiner's rejections in turn.

I.   Rejection of the Claims Under 35 U.S.C. § 103(a)

In the Office Action dated February 24, 2006, the Examiner rejected Claims 1-19 and 23-24 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Published Application No. 20040205644A1 ("*Shaughnessy*") in view of "XLinkProxy: External Linkbases with XLink" ("*Paolo*"). Claims 1 and 10 have been amended, and Applicants respectfully submit that the amendments overcome this rejection and add no new matter.

Amended Claim 1 is patentably distinguishable over the cited art for at least the reason that it recites, for example, "wherein displaying the placeholder further comprises, receiving a selection of typed data in the electronic document while operating in the editing mode in which the markup language tags are not displayed, the typed data being associated with the placeholder for a tag; receiving a delete request for the typed data; and in response to receiving the delete request, removing the typed data and inserting the placeholder for the tag associated with the typed data."

Amended Claim 10 includes a similar recitation. Support for these amendments can be found in the specification at least on page 3, lines 9-17.

Consistent with an embodiment of the claimed invention, a mouse, keyboard, or other type of input device may be utilized to select a placeholder. (*See* the Specification, page 3, lines 9-10.) After selection, any typed data will cause the placeholder to be hidden and the typed data to be inserted into a tag. (*See* the Specification, page 3, lines 10-12.) If the typed data is later deleted, the placeholder will again be displayed. (*See* the Specification, page 3, line 12.) In this manner, a user can type data into a markup language tag without having to actually see the location of the tag itself. (*See* the Specification, page 3, lines 12-14.)

In contrast, and as admitted by the Examiner, *Shaughnessy* at least does not teach or suggest displaying the placeholder for each of the one or more markup language tags that is empty while operating in an editing mode in which the markup language tags are not displayed. (*See* Office Action, page 5, lines 20-22.) Furthermore, *Paolo* does not overcome *Shaughnessy's* deficiencies. *Paolo* merely discloses a linking model of the World Wide Web. (*See* Abstract, page 57, line 1 col. 1.) In *Paolo*, after a number of problems associated with certain situations are resolved, a link is added to a document. The situations comprise problems in counting, problems in nested links, and overlapping anchors. (*See* page 61.) Nowhere in *Paolo* does is suggest or disclose displaying placeholders, much less removing typed data and inserting a placeholder for a tag associated with the typed data. Like *Shaughnessy*, *Paolo* at least does not teach or suggest displaying the placeholder for each of the one

or more markup language tags that is empty while operating in an editing mode in which the markup language tags are not displayed.

Combining *Shaughnessy* with *Paolo* would not have led to the claimed invention because *Shaughnessy* and *Paolo,* either individually or in combination, at least do not disclose or suggest "wherein displaying the placeholder further comprises, receiving a selection of typed data in the electronic document while operating in the editing mode in which the markup language tags are not displayed, the typed data being associated with the placeholder for a tag; receiving a delete request for the typed data; and in response to receiving the delete request, removing the typed data and inserting the placeholder for the tag associated with the typed data," as recited by amended Claim 1. Amended Claim 10 includes a similar recitation. Accordingly, independent Claims 1 and 10 each patentably distinguishes the present invention over the cited art, and Applicants respectfully request withdrawal of this rejection of Claims 1 and 10.

Dependent Claims 2-9 and 11-24 are also allowable at least for the reasons described above regarding independent Claims 1 and 10, and by virtue of their respective dependencies upon independent Claims 1 and 10. Accordingly, Applicants respectfully request withdrawal of this rejection of dependent Claims 2-9 and 11-24.

II.   Conclusion

In view of the foregoing remarks, Applicants respectfully request the reconsideration and reexamination of this application and the timely allowance of the pending claims. The preceding arguments are based only on the arguments in the Office Action, and therefore do not address patentable aspects of the invention that

were not addressed by the Examiner in the Office Action. The claims may include other elements that are not shown, taught, or suggested by the cited art. Accordingly, the preceding argument in favor of patentability is advanced without prejudice to other bases of patentability. Furthermore, the Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 13-2725.

Respectfully submitted,

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